

## Paul Cramer

---

**From:** CPCinfo  
**Sent:** Tuesday, January 10, 2017 8:34 AM  
**To:** Paul Cramer  
**Subject:** FW: VCPORA/FQC comments on MP amendments

**From:** Meg Lousteau [mailto:meglousteau@gmail.com]  
**Sent:** Monday, January 09, 2017 4:58 PM  
**To:** CPCinfo; Robert D. Rivers; Leslie T. Alley  
**Cc:** VCPORA; susan@frenchquartercitizens.org; Rick Normand  
**Subject:** VCPORA/FQC comments on MP amendments

Dear City Planning staff and commissioners,

Thank you for the tremendous amount of work that has already gone in to the Master Plan amendment process, and for the work that remains to be done. It is quite an undertaking, and there is still much work to be done!

VCPORA and French Quarter Citizens are very familiar with the Master Plan, having worked to get the charter amendment passed, and then working on the plan and process themselves for many years. We were also active participants in the revision of the Comprehensive Zoning Ordinance. We understand how vital it is that both of these documents set clear, fair, and enforceable standards for land use across the city.

In that spirit, we offer comment on four proposed amendments.

### ***Tout ensemble***

The first is a proposal from the City Planning Commission to delete "tout ensemble" from the text regarding Mixed Use-Historic Core. The language of the proposed change reads as follows, and as you can see, "tout ensemble" has been stricken:

Development Character: The density, height, and mass of new development will be consistent with the character and ~~tout ensemble~~ of the surrounding historic neighborhood. Appropriate transitions will be provided to surrounding residential areas.

The term “tout ensemble” is central to protecting the Vieux Carré’s architectural integrity. In fact, it was part of the landmark *City of New Orleans versus Pergament* case decided by the Louisiana Supreme Court. The judges ruled that “The purpose of the ordinance is not only to preserve the old buildings themselves, but to preserve the antiquity of the whole French and Spanish quarter, the *tout ensemble*, so to speak, by defending this relic.” Tout ensemble – which means, literally, “all together” - is now enshrined in the land use lexicon, not just in New Orleans but nation-wide, as a term for preserving the whole of a neighborhood.

Retaining the term in the Master Plan reinforces the importance of *tout ensemble* as a guiding principle for land used and redevelopment in the city’s oldest neighborhood and its main economic driver. We can see no reason to remove it.

### **Culture-serving business and facilities**

CM Ramsey has submitted a proposed amendment that would allow “culture-serving businesses and facilities” in Residential Historic Core neighborhoods (see citation below). The language is vague, and no definition is offered, so it’s difficult to ascertain the potential impact. Whether the proposed amendment intends to encompass bars and nightclubs, or is even broader, it’s possible, even likely, that such a change would mean that residentially-zoned properties could become commercial. The point of zoning is to provide stability and predictability. Allowing potentially incompatible uses, especially in residential areas, could be damaging to neighborhood and residential stability. We would like to better understand the intent and effect of this proposed amendment, and look forward to reading the staff analysis.

<http://www.nola.gov/nola/media/One-Stop-Shop/CPC/Council-District-C-CM-Ramsey-District-C-Text-Ch-6-and-13.pdf>

1.d.

*In Chapter 14, revise RESIDENTIAL HISTORIC CORE category to include culture-serving businesses and facilities.*

### **Removal of time limits for legal non-conforming uses**

Another proposed amendment, submitted by MACCNO (<http://www.nola.gov/nola/media/One-Stop-Shop/CPC/MACCNO-Chps-5-7-text.pdf> - page 9), would change language in Chapter 6 to effectively do away with the concept of legal non-conforming use. The request would allow any parcel that could “show a history of hosting live entertainment should be granted **perpetual** non-conforming status for live entertainment that is tied to location, not business or owner” (bolding ours).

This exemption would be irrespective of how long ago the location had hosted live entertainment, or the justifiable expectations of adjacent property owners who purchased their properties with the understanding that they could rely on the zoning. Furthermore, it would seem difficult, legally, to exempt live entertainment usage alone. Should this amendment pass, we foresee other applicants arguing that it should apply to all commercial usage, which, given the city’s complex history of land use, would open up a can of zoning worms.

We request that the staff and commission stick with the existing 6 month time limit for a parcel with a legal non-conforming use to resume operations, or lose its grandfathered status.

### Authority of CPC Executive Director

Request 14-22, Section A.

This submission, from the City Planning Commission, would give the executive director or his/her designee the authority to make final decisions on minor map amendments, as well as to make final decisions on Future Land Use Map. This would violate the city charter (section 5-404.4), which specifies a mandatory review process and schedule. It also mandates public input in amending the Master Plan. These limitations were designed to safeguard the integrity of the Master Plan, and we believe strongly that they should remain in place.

Kind regards,

Meg Lousteau

Meg Lousteau  
Executive Director  
Vieux Carré Property Owners, Residents, and Associates  
816 N. Rampart Street  
New Orleans, LA 70116  
504.581.7200 o 504.621.4080 c  
[meglousteau@venora.org](mailto:meglousteau@venora.org)  
[www.vcnora.org](http://www.vcnora.org)

## Paul Cramer

---

**From:** CPCinfo  
**Sent:** Tuesday, January 10, 2017 8:33 AM  
**To:** Paul Cramer  
**Subject:** FW: MP Amendment Comments by R G Kern

---

**From:** [raygkern@yahoo.com](mailto:raygkern@yahoo.com) [<mailto:raygkern@yahoo.com>]  
**Sent:** Monday, January 09, 2017 4:51 PM  
**To:** CPCinfo  
**Subject:** MP Amendment Comments by R G Kern

MP AMENDMENT NOTES 2016-01-09 by Ray G. Kern

### 14. Land Use Plan Amendments

Volume 2 | Chapter 14 | Land Use Plan | Proposed Master Plan Amendments

#### A. Introduction

I am against the removal of "densities" and "density" in land use considerations. Density should be considered, particularly in preservation of neighborhood residential character. Neighborhoods should be livable as well as accessible. "Packing them in" is not a good plan as it affects accessibility (parking), livability, and quality of life for residents. This ain't New York City or Miami.

#### Administration of the Land Use Plan

I am troubled that the Executive Director of the City Planning Commission and the Commission itself is being granted too much power in making final decisions to Future Land Use Map adjustments and interpretations. I can understand the need for obvious minor corrections, but where is a check-and-balance for decisions motivated by patronage and influence? Any review of our political history will show this does happen.

The Neighborhood Character Studies in the Land Use Plan

Is this being removed? It seems like a good thing to have.

#### B. Setting the Direction for Future Land Use:

The word "densities" has been removed. See comments above.

#### C. Future Land Use Categories

##### Mixed Use

MIXED-USE HISTORIC CORE: MU-HC

The phrase "tout ensemble" should NOT be removed but retained. It is a very important consideration in preserving the character and "feel" of historic neighborhoods.

## **PARKLAND AND OPEN SPACE**

Does the addition of "supportive commercial uses may be allowed" means that there can be fast food chains in our city parks?

### **D. Future Land Use by District Planning District 7**

Please do not add this:

"Marigny and Bywater Riverfront Areas: Between Elysian Fields Avenue and the Inner Harbor Navigaton Canal, there are large, historically industrial parcels with the Mixed Use Historic Core designation which would support more dense residential development on high ground with ground floor commercial uses for a lively pedestrian environment."

I can't believe what is essentially the controversial Riverfront Overlay above is being enshrined in the Master Plan. There is much concern about affordable housing for current and long-time residents. How much of the "more dense residential development" will be affordable? Bourbon Street is "a lively pedestrian environment". Will this be "Bourbon Street on the River?" Is this the city's attempt to permanently mar these relatively developer-unscahed, extremely historic downriver neighborhoods. There's a powerful intrinsic value in our history and architecture. There are better plans for development of this mixed use area that should be considered as viable alternatives that blend in far better for the public good and do not involve exploitation by a greedy few.

Sincerely Yours,

Ray G. Kern  
8240 Panola Street  
New Orleans, LA 70117

2716 Royal Street  
New Orleans, LA 70117

**Paul Cramer**

---

**From:** CPCInfo  
**Sent:** Tuesday, January 10, 2017 8:33 AM  
**To:** Paul Cramer  
**Subject:** FW: MP Amendment Comment HCNA 010916

---

**From:** John Koefel [mailto:johnkoefel@gmail.com]  
**Sent:** Monday, January 09, 2017 4:53 PM  
**To:** CPCInfo  
**Cc:** hcnaboard-@googlegroups.com; Dominique L. Verner  
**Subject:** MP Amendment Comment HCNA 010916

January 9, 2017

City Planning Commission

1300 Perdido St—7<sup>th</sup> Floor

New Orleans, LA 70112

[cpcinfo@nola.gov](mailto:cpcinfo@nola.gov)

Re: Master Plan Amendment Comments of Holy Cross Neighborhood Association

Dear Commissioners and Staff,

We wish to submit the following comments in the MP process today:

1. With respect to our HCNA previously submitted comments that were listed in the summary as Text 06-08 Locks & Bridges, etc and Text 04-23 Zoning and Land use principles—we failed to find them though saw in the summary index.
2. We believe our original amendment requests remain worth incorporating into the MP. The Corps has recently proposed removing the St Claude Bridge and historic IHNC Lock in favor of the barge industry without the least consideration of impacts on the City of New Orleans itself and its neighborhoods and historic future. We feel the City should consider its own stake in these structural assets and make its own assessments, decisions and initiatives toward what is good for the City and its future. You don't know what you have till its gone, the song says. Provisions in the MP can help the City in this respect to look broadly ahead. These structures in question are 100 years old and still functioning, nationally significant maritime and engineering structures built by Goethals and Strauss, famous people. This speaks to the unique need and opportunity we have to reach out to speak for these extraordinary past achievements and move them with our historic web of neighborhoods into the future. If the City sleeps, they disappear.

2. FLUM PD-8-1 5227 Chartres St. The CPC suggests to be consistent that the FLUM should be altered to be consistent with the zoning (business). We suggest that it be unchanged for the following reason: The FLUM has it right, as the neighborhood wants, and was arrived at through broad inclusive planning process

The zoning change was necessitated when The Center for Sustainable Engagement and Development (CSED) was given a residential property and decided to use it as a demonstration recovery house with state of the art insulation, etc, and to have offices there to be available to the public. The neighborhood did not want the zoning change but the city insisted because no one would reside there, (a condition of residential zoning). What was done was a proviso to let the zoning revert to residential when the CSED moved out, and the house would be residential again.

In this circumstance, then, it is the zoning that is out of synch with the community-established FLUM, and the FLUM designation should remain as the stable intent.

3. FLUM PD-8 -9/PD-8-10. We found these on the map but not in the text. We understand that these are private lots designated as Open Space/Park and perhaps should not be. We have no objection to the concept of correcting this record, if this is the case (we couldn't find these either except on the map). But we believe a more open public process is merited for any FLUM change, including these. There are no minor changes to the FLUM in Holy Cross, and no changes we would cede to the planning director to make on our behalf for land use matters.

4. Request No. 14-22 Section A. Land Use Plan and "Force of Law" (Cf #3 preceding).

5. Request No. 14-15 and 14-16, Section C, etc. Future Land Use Category. We do not want to see multi-family capacity come into our historic one and two family zones, without some future public dialogue and assent from the neighborhood. We oppose increasing density through categorical change here without much more public discussion and acceptance. People here in Holy Cross want to live with the doubles and singles they moved in

here to and have invested in. They welcome new neighbors but see allowance of multi-family as an encroachment, and unfair, to do it this way.

6. In the general matter of removing density as a specification in residential zoning categories, this does not seem desirable, useful, or prudent. We know that density has great impact on community and residential areas. We feel this is particularly important for historic neighborhoods of one and two family houses where incongruous structures bring discontinuity and unravel old neighborhoods. Instead of removing limitations on density, we would rather this code be helping historic neighborhoods survive and thrive by giving more protection to the scale and shape of building in these areas of high community value and solid contribution to the tax base. (Cf. Request No. 14-17, Section C, etc., Future Land Use Categories).

7. Density should focus around transportation hubs, not just on high ground. There is a lot of high ground, including along the river neighborhoods, that is unsuitable for high density because of the lack of transportation facilities. MU-1 should be restored to its original purpose and definition, as the zoning category for high-rise buildings on transit lines and highways and at crossroads.

Conversely, building high rise structures away from transit, away from fast roadways and away from solid adequate infrastructure seems a recipe to bring it all to a standstill because of the heavy load on older more remote neighborhoods with aging facilities that are fine for low density but fail with overload, fail for everyone.

8. We do not want to see merging of land use categories MUL and MUM. We feel this would create a category much too awkward and unwieldy. As it is, the large categories of the "consistency table" allow a broad land use category to be arbitrarily assigned a zoning classification that may not be suitable or intended by the community. It is important that the community be involved in the application of the specific zoning from broad land use categories. The selection of MUMD in Future Land Use Element participation becomes meaningless if the variation and range of the zoning in the consistency table is too large and the zoning selection is made by staff. Alone. This selection at least demands more, not less, community participation. This is at the heart of land use decision-making that is supported by the City Charter, and rightfully requested of the staff by citizens of Holy Cross and throughout the City.

9. Re: Port NOLA Site GIWW 35 in PD-11 along Paris Road. The FLUM is requested changed by the Port of New Orleans. This was requested five years ago also but denied until an independent evaluation was made by competent scientific agencies to determine the impacts on Bayou Bienvenue, which passes through this site.

We have no beef with the Port, but we are concerned about the integrity and health of this Bayou and feel the least we can do is check it out and do what is needed to ensure its health and survival. We think the Port necessarily has a conflict of interest here, despite the best intentions. So we feel that before amending the FLUM and zoning, the condition of Bayou Bienvenue should have some priority. So we oppose the change in FLUM here until this has been positively ascertained and a plan is worked out with the Port to do what is necessary. We have confidence in the Port but we are practical and realistic too, and care very much about the bayou that begins now in Lower Nine and goes into Lake Borgne via Port property.

10. Transportation

11. Planning Districts.

Thank you.

Sincerely,

John Koefel

Board chair, HCNA

Holy Cross Neighborhood Association

[johnkoefel@gmail.com](mailto:johnkoefel@gmail.com)

## Paul Cramer

---

**From:** Jay Seastrunk <jay.seastrunk@icloud.com>  
**Sent:** Monday, January 09, 2017 1:44 PM  
**To:** Paul Cramer; Leslie T. Alley; CPCinfo  
**Cc:** Susan G. Guidry; Stacy S. Head; LaToya Cantrell; Patty Gay; sistokes@earthlink.net  
**Subject:** Public Comment > Master Plan Amendments 2016-2017

Below are my comments on the Mayor's Office Proposed Text of new FLUM Categories:

I am completely opposed to the gutting of the original master plan language which with great neighborhood and community input was to preserve the current character and use of our neighborhoods. This wholesale replacement of the goals of the master plan with a white paper generated in the vacuum of the Mayors' office with little broad public comment or input is inappropriate and a wholesale political sell out of the original Master Plan that was formed with significant and broad community input.

1. I especially oppose the proposal to "Eliminate all residential unit densities in all Future Land Use Categories" We have significant quantities of historic housing that are based on one and two family units (low density) – and have been designated as such for decades. We also have some single family residential areas which have been designated as such for decades. To eliminate a direct relationship between residential unit densities and future land use categories (such as one and two family with low density) provides too much flexibility to politicians to change our neighborhoods in ways that most constituents of one and two family neighborhoods are opposed to. The Master Plan was created to provide stability and predictability as well as the rule of law (true equity – not equal outcomes or results) – in practice it has done anything but that, especially with dramatic modifications such as these being proposed by "leadership". I consider this proposal to be a direct threat to the historic one and two family residential neighborhoods of Uptown New Orleans which are a vital part of its historic success as a resilient livable city. In my view this proposal is contradictory to the stated goals of resiliency.
2. I find "allow storm water management / mitigation as a primary use" lacking in description, outcome, and intended result. What does this mean? Does it mean pervious parking lots become an allowable primary use because they allow water to permeate through them? This needs more objectively defined criteria with an explanation of its merits, benefits, and possible negative consequences before it should even be considered as an amendment.
3. I find "Consider increasing allowable density and uses in areas of higher elevation and lower flood risk" to be a direct threat to the historic one and two family residential neighborhoods of Uptown New Orleans and oppose it.
4. Not unlike item 2 above I find "Incorporate built environment risk reduction and adaptation into the "Development Character" of all Future Land Uses to be poorly defined, with none of its benefits and negative impacts stated/defined for evaluation.
5. I find creation of Residential Mixed-Density Suburban a threat to our one and two family neighborhoods – we have more than adequate supply of undeveloped property in a wide range of areas of the city of New Orleans – there is no need to compromise through change existing suburban one and two family residential neighborhoods by mixing in a variety of other uses and densities in with them.
6. I find merging of Mixed-Use Low Density and Mixed-Use Medium density a threat to mixed use low density areas of the city and the low density residential districts adjacent to them. This is all being thrown around without appropriate discussion of what current safeguards are provided by Mixed use low density zoning districts that are not available in mixed use medium density. Again this appears to allow too much flexibility and not enough protection to the currently designated lower density areas.

7. For the reasons discussed above I oppose merging residential single family post war, residential low density post war, and residential multi family into one new category called Residential Mixed-Density Suburban lacking in safeguards and protections for one and two family neighborhoods.

#### Volume 2 Chapter 1 Vision:

1. Equity sounds wonderful but I find it disingenuous at best to be proposing all of these amendments that gut the protections currently offered to low density residential neighborhoods when none of the residents of these low density neighborhoods have been queried or involved in the proposal of the amendments that will dramatically change what is allowed to be constructed in their neighborhoods – so by its very process the current Master Plan Amendment cycle is creating inequity because the residents of the neighborhoods with the most dramatic change proposed are not at the table and are not being heard by the Administration, City Planning Commission, & Council and in fact are barely informed of what kind of changes are in store. So the inclusion of the word Equity is laughable given this. Be it the recent forcing of short term rental commercial activity into residential neighborhoods or the current Master Plan cycles gutting of protections to one and two family residential districts as of now the tax paying long term residents of low density neighborhoods are the underserved and underrepresented whose participation is not occurring in the changes being brought to their neighborhoods – most constituents are not even aware of the details of the change that is proposed much less the real world potential effects – that IS NOT EQUITY, this is 180 degrees in opposition to the Master Plan effort that occurred immediately after Katrina and I would say is even attempting to undo it.
2. The statement box on Equity does not adequately describe the planning means at the cities disposal of “eliminating income and neighborhood inequities” – how does the city propose to do this? Before this statement box is added to the master plan it is critically important to quantify what tools are available to achieve this within the realm of planning, which tools have a proven track record of success, and which tools are supported by the majority of residents in the planning districts effected by their implementation – anything less than this is once again not equitable because it is representing the needs of one group over the needs of another without any input from the groups most effected. Based on the amendments submitted it would appear the city proposes to eliminate income and neighborhood inequities by gutting successful low density neighborhoods through allowing them to be densified then controlling how this added density is injected (via a prejudiced political process) as opposed to allowing capitalistic market forces to control development. It appears that the city wants to eliminate income and neighborhood inequities through economic interference which in the end will make all of the city’s neighborhoods average and simultaneously eliminate the unique qualities that make existing neighborhoods strong. This kind of political interference is a proven destructor of success and value in the detritus of social experiments in city planning that have been foist upon citizens over the decades only to be leveled as failures and replaced with plans there are poorly thought out and quickly implemented with their only mantra being good intentions. Name one successful example in any city of planning and zoning practices that have eliminated income inequity and not destroyed value at the same time?
3. Remove equity from the Resilience box – goals are stronger when they are not intermixed but instead are clearly stated and stand on their own. By stating that “Equity” is the driving force behind our cities economic growth the Resilience box has essentially been hijacked by the equity box above it.

#### Volume 2 Chapter 5 Admin:

- Under section 2 Goal it appears the term Equity defined as being fair and impartial is being confused with the word equal which is defined as the state of being the same in quantity, size, degree or value (identical, uniform, alike). It is fundamentally unfair to those who live in neighborhoods and areas with high levels of market activity and high home prices in one and two family districts to suddenly and radically inject multi-family affordable housing opportunities in their neighborhood using “all tools available” – this is clearly favoring one group (affordable housing customers) over other groups (tax paying long term owners of improved property in successful neighborhoods where they have invested their blood sweat and tears) This is not equity but theft by government reallocation.

#### Volume 2 Chapter 6 Admin:

- The posted document has incomplete edits that are not visible in the pdf due to formatting – this document should be withdrawn because it is not properly posted for public comment.

#### Volume 2 Chapter 7 Admin:

- I am opposed to the elimination of the promotion of tree planting on private property. The trees of New Orleans are a prime asset and should be protected and encouraged. The proposed amendment eliminates the promotion of the planting of trees on private property

#### Volume 2 Chapter 9 Admin:

- It seems odd that under Entrepreneurship and Innovation they are replacing some statistics and updating some information but leaving other information in the document even though it is old and could certainly be updated with more recent data. Data from 2005, 2006, and 2007 could certainly be updated to reflect more recent data.
- Deleting the labor force participation information without updating it suggests this document is for show and not an accurate assessment of the current situation.
- The Administration appears to be re-authoring the entire section without much balance or independent facts being presented.
- Deleting ranking of household income is further evidence of this wholesale authorship.
- Deleting ranking of poverty rate is further evidence of this wholesale authorship.
- The posted document edit is only one page in length yet the document appears to continue to multiple pages. This is not adequately posted for review and comment and should be withdrawn.

#### Volume 2 Chapter 12

- As above this is attempting to inextricably cross define equity and resilience – these terms should stand on their own with no need to reference each other and this significant cross definition (equity is resilience, resilience is equity) weakens the objectivity and intent of the document especially since the ongoing theme is to put these terms in every section in some way without adequately and objectively defining what they mean in terms of outcome and result. What is ideal equity? What is ideal resilience? What is the goal and what does the goal look like in a planning and zoning perspective? Uptown New Orleans after Katrina which included all types of classifications of residence be it race or socio economic was very resilient after Katrina and it had little to do with planning and zoning, but more to do with geography and strength of one and two family neighborhoods which much of these amendments appear to be trying to dilute and eviscerate contradicting the goal of resiliency. Further please define how the current Master plan is lacking in equity before making it such a strong component of the amendments.
- The section on Resilience again appears to be breaking down in its proper use of the term by defining it as it relates to *“inequities in the distribution of environmental benefits and burdens in the city”* – WHAT DOES THIS MEAN? What is an environmental benefit and how is it unfairly distributed? By whom? To Whom? What are the current impacts of climate change on the city of New Orleans and where is the data?? Bringing the largely partisan and contentious ideas of Climate Change into the Master Plan document seems unproductive especially as it relates to a successful city. In order to include this statement in the amendments it should include what methods the city will *“link existing inequities in the distribution of environmental benefits and burdens in the city and reducing the risk for the most vulnerable populations who have the fewest resources available to mitigate the impacts of disasters and climate change”*

#### Volume 2 Chapter 14 Land Use:

- The suggested text placement on Equity needs more validation as it is making statements which are vague and subjective without much backup or objective criteria that define “public good”. The Equity text also does not define what an “optimal outcome” is. Before this language is inserted it is critical that the definition of what an optimal outcome is be a required part of text – without it this becomes a basis statement for removing the rule of law from the Master Plan and turning it into a political tool for politicians to define “public good” and “optimal outcome” at their will with little public input.

- The Goal 5 “Target” has no place in this document without understanding in detail the cost benefit of doing this and who would most negatively be impacted by the high cost of doing this which would likely be those least able to afford it. This is no better illustrated by the placeholder goal of “by X in X year”
- The Goal 6 “Target investments” seems inequitable on its face because it favors some groups over others rather than equity which would be for all citizens of New Orleans.

#### Volume 2 Chapter 15 Neighborhood Participation Program (NPP-Program)

- This proposed text change appears to be an effort to tie the true definition of equity (fairness and impartiality) that is inherent in a well administered neighborhood participation process (which in my opinion the city of New Orleans does not currently have this MP amendment process being a case in point) to the improper use of the word equity throughout other sections of the Master Plan which imply equal outcome, equal value, equality, identical in every way. Because the term equity is being misused throughout the rest of the document I am opposed to its use in this section.
- The primary pillar of city governance should be neighbors and neighborhoods as constituents. This document is about planning and land use not city governance.
- The Neighborhood councils as originally envisioned should be implemented – the NPP process needs to be strengthened by the participation of neighborhood leaders in different and diverse neighborhood not centralized on the executive branch of the city. No reasons are given why the neighborhood councils have not been established or why they are a bad idea.
- This statement is false: “NEO has defined a notification process that initiates notification to key stakeholders (neighborhood and community leaders) with sensitivity to time schedules and calls for action.” NPP notifications are not advanced enough nor automated enough to garner significant input. The one meeting often has notices that arrive after the meeting has taken place – the information from the meeting (presentation comment etc) is not easily referenced after the meeting has occurred so individuals who could not attend can participate. Public comment process and deadlines are also not easily ascertained on a project basis and it isn’t clear that public comment is acted upon unless a politician gets involved by expressing concern.

#### GENERAL COMMENT:

The average citizen, myself included does not have the time to review all of these proposals and comment on each and every change much less time to proof read and edit those comments – I have picked a few which illustrate a general pattern in the majority of proposed amendments. They appear to favor vocal groups and organizations who claim to represent some constituency yet have little input from individual residents, neighbors or neighborhoods that will be impacted by the changes. I see proposals generally that appear to vest commercial rights in properties located in residential zoning districts, including properties that are no longer commercial but were at some time in the past, and proposals that appear to support providing undefined and unknown development rights to existing non-conforming properties by changing the language which favored protection of existing historic residential to language that favors re-establishment, expansion or alteration of commercial properties in residential districts with unknown limitations and controls. This is of great concern especially with regard to section 25.3.G.6 Existing nonconforming hospitals in single family or two family residential districts. As an individual I have enquired by email about how these proposed Master Plan amendments might affect zoning of existing hospitals in residential districts and have received no response.

Basically the amendments appear to favor activist interest groups at the expense of individual residents and residential neighborhoods – historically it is the strength of neighborhoods that gives strength and resilience to New Orleans – these master plan amendments appear to want to experiment with the strength of neighborhoods by creating a more homogenous planning guideline where individuality of neighborhoods in both physical and economic aspects is sacrificed for homogeneity and will provide average rather than exceptional results as the detritus of since demolished or blighted past social experiments implemented via heavy handed government planning have achieved.

Best Regards,

Jay Seastrunk

## Paul Cramer

---

**From:** Jay Seastrunk <jay.seastrunk@icloud.com>  
**Sent:** Monday, January 09, 2017 1:37 PM  
**To:** CPCinfo; Paul Cramer; Leslie T. Alley  
**Cc:** Susan G. Guidry; T. Gordon McLeod; Stacy S. Head; LaToya Cantrell  
**Subject:** FW: Master Plan Text Amendment

I am submitting the below email as public comment as I did not receive a response and would like one to give my neighbors and neighborhood the information so that they may have an equitable opportunity to respond. This is in regard to a text modification outlined below and proposed by CPC that could have a major impact on my neighborhood.

Best Regards,

Jay Seastrunk

---

**From:** Jay Seastrunk  
**Sent:** Wednesday, October 05, 2016 09:54  
**To:** Paul Cramer <[pcramer@nola.gov](mailto:pcramer@nola.gov)>  
**Cc:** T. Gordon McLeod <[tgmcleod@nola.gov](mailto:tgmcleod@nola.gov)>; Susan G. Guidry <[sgguidry@nola.gov](mailto:sgguidry@nola.gov)>; Leslie T. Alley <[ltalley@nola.gov](mailto:ltalley@nola.gov)>  
**Subject:** Re: Master Plan Text Amendment

Whoever is best to answer:

How does the proposed amendment if adopted effect existing non conforming hospitals in a residential in existence before Oct 19th 1967? - or how does it effect section 23.3.G.6? Further if the 1 and 2 family designation is eliminated which looks like part of the mayors request regarding number of units in residential zoning districts (from memory on that maybe not exactly what was requested) how are these sections effected?

### 25.3.G.6 EXISTING NONCONFORMING HOSPITALS IN SINGLE-FAMILY OR TWO-FAMILY RESIDENTIAL DISTRICTS

I would like to know the effect before commenting.

Thank you,

Best Regards,

Jay Seastrunk

On Oct 5, 2016, at 09:11, Paul Cramer <[pcramer@nola.gov](mailto:pcramer@nola.gov)> wrote:

City Planning proposed that amendment.

---

**From:** Jay Seastrunk [mailto:seastrunk@seastrunk.org]

**Sent:** Tuesday, October 04, 2016 5:38 PM

**To:** T. Gordon McLeod

**Cc:** Paul Cramer; Susan G. Guidry; Leslie T. Alley

**Subject:** Master Plan Text Amendment

Gordon,

I am wondering who has proposed the below quoted text amendment - the underlined / bold portions I have marked are particularly concerning to me as currently our neighborhood has some protections from the existing non conforming hospital located in the middle of it which this document looks to erode with very subjective non specific language.

Please advise what you know when you are able.

Best Regards,

Jay Seastrunk

<<RESIDENTIAL LOW DENSITY PRE-WAR

Goal: Preserve the scale and character of pre-war (WWII) residential neighborhoods of lower density where the predominant use is single and two- family residential and allow for compatible infill development. Discourage the development of additional multifamily housing that is out of scale with existing character. Allow the adaptive reuse of historic non-residential structures with densities slightly higher than the surrounding neighborhood through the planned development process.

Range of Uses: New development generally limited to single, or two-family, or compatible multi-family dwellings., and The preservation of existing multifamily buildings is also allowed. Businesses, and traditional corner stores, and mixed use may be allowed where current or former commercial use is verified. Agricultural, stormwater management, and supporting public recreational and community facilities (e.g., schools and places of worship) also allowed. Conversion to multifamily **and commercial uses may be allowed for certain existing historical institutional, commercial or other non-residential uses buildings.**

Development Character: New development will fit with the character and scale of surrounding residential neighborhoods where structures are typically located on smaller lots and have minimal front and side setbacks. Maximum density of 24 units/acre.>>

<http://www.nola.gov/nola/media/One-Stop-Shop/CPC/CPC-proposed-Future-Land-Use-Text-Change-Amendments.pdf>

## LOUISIANA LANDMARKS SOCIETY'S COMMENTS ON PROPOSED MASTER PLAN AMENDMENTS

*Submitted January 9, 2017*

Louisiana Landmarks Society appreciates all the work put into the Master Plan Amendments by officials, neighborhood groups, organizations and individuals. There has been a tremendous amount of material submitted and yet the process seems to have been cut short. We question if the process and comment period are adequate. With that said, we submit the following limited comments:

### Chapter 6:

The proposed pdf of Chapter 6 is improperly posted and not fully readable. This does not allow for adequate comments.

1. The new local historic districts, now approved by the City Council, should be added to the list of local historic districts.
2. Louisiana Landmarks Society requests the word "sustainable" be retained throughout the chapter.
3. Deconstruction and salvage should *NOT* be removed from the preservation chapter. We suggest encouraging deconstruction and salvage prior to the demolition of any historic building.
4. Enhancing guidelines for New Construction should always include that designs, whether contemporary or not, be in scale and character with the existing historic neighborhood. Any new design, rehabilitation or renovation should complement and be in context with the "tout ensemble" of the neighborhood.
5. Louisiana Landmarks Society should be identified and consulted as an additional community resource in matters concerning historic and neighborhood preservation.
6. Although Equity and Resilience are admirable goals, their inclusion in Chapter 6 is technically not the correct placement.

### Chapter 14.

1. Louisiana Landmarks Society is opposed to empowering one person, namely the Executive Director of the CPC, to have authority to make final decision on minor map amendments and final decisions on interpretation of the FLUM.
2. Louisiana Landmarks Society strongly objects to the proposal to remove density limitations on all residential land use categories.

3. Objection is made to proposals seeking to allow small multi-family residential as being too broad and inconsistent with existing language to discourage multi-family residential that is out of scale with neighborhoods.
4. Louisiana Landmarks Society discourages the proposal to merge MUL and MUM zoning categories. (4-17 Section C)
5. Objection is made to the proposals that would grow commercial uses, or provide for ill-defined "culture-serving" uses, at the expense of conducive and established neighborhood uses. The interpretation has the potential to be too broad.
6. Louisiana Landmarks Society requests the retention of "tout ensemble" in Chapter 14, and encourages the term to be used more often to define and retain the individual and unique character of each neighborhood in New Orleans.
7. The Land Use chapter is an inappropriate placement for definitions of Equity and Resilience. Vision seems the more logical place.
8. We fully support the proposal to "preserve and expand parks and green space, and protect passive open green space in parks from conversion to intensive and commercial uses."

#### Community Participation Plan (CPP)

Louisiana Landmarks Society supports the implementation of the CPP including adequately staffing the CPP with professional, independent staff to engage and inform community members, ensure full and accurate information is provided by applicants on their projects, provide information on zoning, facilitate meetings and produce objective reports on Neighborhood Participation Program (NPP) meetings.

#### General Statement:

The mission of Louisiana Landmarks Society is to support historic and neighborhood preservation, and all matters of zoning and planning that have the effect of contributing to and sustaining the *tout ensemble* and the historic character of each neighborhood in the City of New Orleans. Louisiana Landmark Society is a firm believer in and consistently supportive of a broad and inclusive public and neighborhood participation in all civic processes, especially those that directly affect and influence the well-being and quality of life of the residents in the neighborhoods.

Comments on Other's Submissions:

- **HousingNOLA & GNOHA**

While we see natural alignment between housing affordability and historic preservation in a city where overzealous blight remediation and under-regulated short term rentals have reduced residential units in traditional neighborhood, we have significant concerns about the criteria for and abuse of any exemption to HDLC or VCC guidelines on the basis of affordable units. *In particular, promises of new affordable units should never be the basis for demolition of an historic structure that would otherwise be disallowed.* Numerous examples within the city show the potential for the adaptive use of historic structures to provide affordable units. If this addition is included, we request that preservation and neighborhood groups be specified in the "Who" field to indicate an inclusive stakeholder process.

- **MCCNO**

6A. We support the proposed citywide survey to identify arts and cultural venues of historic significance. A thorough review of existing surveys of National Register Districts could serve as the basis for such an inventory.

6B. Attaching a conditional use such as live music performance to a property in perpetuity is not appropriate within residential neighborhoods. Doing so fails to acknowledge the disparate impacts on quality of life—including noise, foot and vehicular traffic, refuse collection, etc.—associated with different venues. At a bare minimum, any non-conforming use attached the parcel rather than owner should be accompanied by provisos to safeguard neighborhood quality of life and community members should be invited to provide input on the decision.

6C. Proposed soundproofing grants should come with the additional provision that any recipients be required to demonstrate that the materials being used are appropriate and compatible with historic building fabric and that historic exterior elements, such as windows, not be impacted.

- **Mayor's Office**

3.A The proposed changes related to a pattern book of "Resilience Strategies for Historic Commercial Corridors" are consistent in theme with the proposed amendment from Greater New Orleans Water Collaborative to "to establish guidelines for appropriate resilience retrofits in historic settings [which] address energy efficiency, on-site water management, elevation and related issues." We endorse these proposals to establish resilience best practices for historic places but emphasize the need for substantial involvement by neighborhood associations and preservation professionals in their development. Similarly, it should be clear that a pattern book requires written explanation of guiding principles to be of maximum value.

3.2 Revise but do not remove language regarding the value of salvage and reuse of historic building materials. This is compatible with both goals 3 and 4. The embedded energy, craftsmanship, and inherent quality of materials—particularly old growth lumber and imported quarried stone when present—found in historic structures within New Orleans is grounds for salvage and reuse. Furthermore, the reuse of building materials, like the reuse of buildings, is inherently place-based economic development. Rather than using NCDC as a vehicle to promote

salvage and reuse, the city could simply pledge to support private sector and nonprofit endeavors in this area.

5. Include VCC alongside HDLC as an agency with preservation duties and public outreach responsibilities.

Louisiana Landmarks Society opposes the proposals to “eliminate all residential unity densities in the Future Land Use Categories” as well as other proposals to increase densities due to the impacts on the scale and character of neighborhoods – particularly those in our historic core.

- **Greater New Orleans Water Collaborative**

See comments under Mayor’s Office above.

- **Holy Cross Neighborhood Association**

The proposed registry of contributing structures “not under city jurisdiction, such as state bridges, federal locks, waterways, docks,” etc. would contribute positively to our understanding of New Orleans development over time. It would be made more robust with the inclusion of historically significant public works managed by City Park and the Sewerage and Water Board. While listed structures may not be subject to local oversight by the HDLC or VCC, local recognition of their significance could help inform future Section 106 proceedings as well as Historic American Engineering Record documentation projects.

# NEIGHBORS FIRST FOR BYWATER



Neighbors First for Bywater, LLC

Julie Jones, President

(504) 944-5422

[Jjones1@uno.edu](mailto:Jjones1@uno.edu)

Brian Luckett, Treasurer

(504) 669-7044

[bluckett@cox.net](mailto:bluckett@cox.net)

Robert D. Rivers, Executive Director  
1300 Perdido St., 7<sup>th</sup> Floor  
One Stop Shop  
New Orleans, LA 70112

Date: January 9, 2017  
Re: Master Plan Amendments

Dear Mr. Rivers:

The Board of Neighbors First for Bywater (NFB) has discussed the Master Plan amendment process with our membership and concluded to take the following positions (and as described below):

1. We support all of the amendments proposed by the Louisiana Landmarks Society
2. The Master Plan should retain density limits as required by the City Charter
3. The Master Plan should not be amended outside the formal process and interpretation of the Master Plan should be a legal matter as stipulated by the “force of law” provision of the City Charter.
4. The term “tout ensemble” should remain in the description for the Mixed-Use Historic Core future land use category
5. We oppose Councilmember Ramsey’s amendment to include “culture-serving businesses and facilities” in in the description of the Residential Historic Core future land use category

## **Louisiana Landmarks Society Amendments**

We support all of the amendments proposed by the Louisiana Landmarks Society. These amendments were developed by Louisiana’s leading preservation organization with input from

neighborhood organizations from New Orleans' historic neighborhoods and reviewed and revised by the city's most experienced preservation lawyers. These amendments will protect and preserve the integrity of our historic neighborhoods and the cultures that sustain them. Adoption of these amendments will set a national standard for preservation planning.

### **Density Limits**

We are opposed to removing the density limitations from any future land use category's Development Character section in Chapter 14 (Section C) and believe that all residential future land use category descriptions must include density limits. Density limitations are required by the City Charter (Section 5-402.1) which states, "*The Land Use element shall consist of text setting forth land use issues and policies, and a Future Land Use Map setting forth categories of allowable uses and density, for the City.*" The density limitations provide an overall goal for the development character of neighborhoods and thus are essential to the Master Plan.

### **Force of Law**

We are opposed to the CPC amendment to provide the Executive Director the authority to make final decisions on map amendments and final decisions on interpretations of the Future Land Use Map. This would violate the City Charter, Section 5-404.4, which specifies the mandatory review process and schedule as well as public input process in amending the Master Plan. These limitations on amendments to the Master Plan are a safeguard to protect its integrity.

### **Tout Ensemble**

We are opposed to removing the term "tout ensemble" from the description of the Mixed-Use Historic Core future land use category in Chapter 14, Section C. New mixed-use developments can be very large and overwhelm adjacent historic neighborhoods with foreign and oppositional architecture. It is imperative that new mixed-use developments respect the historic character of the surrounding neighborhoods.

### **Culture-serving Businesses and Facilities**

We are opposed to Councilmember Ramsey's text change to the description of the Residential Historic Core future land use category (Chapter 14, Section C) to include "culture-serving businesses and facilities". The proposed amendment does not provide any specific language or justification for the text change nor is clear why this change should be specific to Residential Historic Core neighborhoods. There is no definition for "culture-serving businesses and facilities" in the Master Plan glossary (Volume 2) so there is no way to interpret such text. Future land use descriptions for residential categories describe residential areas, so it is not clear why commercial uses ("businesses") are being inserted here.

Thank you for your consideration of these points in completing the City Planning staff report on the amendments. We look forward to participating in the amendment process and providing more specific input on matters that affect the Historic Core neighborhoods.

Sincerely,  
Julie Jones, President  
Brian Lockett, Treasurer

**Mark M. Gonzalez**

Attorney at Law

830 Union Street, Suite 302  
New Orleans, Louisiana 70112

(504) 524-1668 - FAX: (504) 524-1066  
e-mail: mark@markgonzalezno.com

January 6, 2017

**VIA TELECOPIER AND E-MAIL: (504) 658-7032**

Robert D. Rivers, Executive Director  
CITY PLANNING COMMISSION  
1300 Perdido Street, 7<sup>th</sup> Floor  
New Orleans, Louisiana 70112

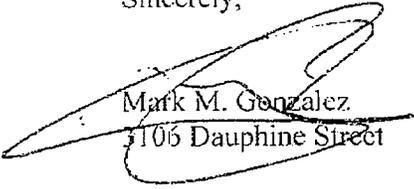
**RE: Master Plan Amendments**

Dear Mr. Rivers and City Planning Commission:

Please accept the following as input from a 30+ year resident of New Orleans very concerned about and involved in its well-being:

1. The Master Plan should retain density limits as required by the City Charter;
2. The Master Plan should continue to have the force of law as specified in the City Charter;
3. The term "tout ensemble" isn't a nice sounding meaningless phrase - it helps describe and determine land use designation and should remain in land use designations for Historic Core areas;
4. I support, and you should as well, the very well studied and laid out amendments sent to you by the Louisiana Landmarks Society;
5. You should NOT support Nadine Ramsey's vague and troublesome proposal for "cultural services" in Historic Core areas until it is well defined what in God's name she is talking about - and if they are good for a Historic Core - they should be good city-wide.

Sincerely,



Mark M. Gonzalez  
3105 Dauphine Street

## Paul Cramer

---

**From:** Robert D. Rivers  
**Sent:** Sunday, January 08, 2017 10:19 AM  
**To:** Paul Cramer  
**Subject:** FW: Proposed changes to the Master Plan

**From:** [knittingduck@aol.com](mailto:knittingduck@aol.com) [mailto:[knittingduck@aol.com](mailto:knittingduck@aol.com)]  
**Sent:** Saturday, January 07, 2017 1:22 PM  
**To:** Robert D. Rivers  
**Subject:** Proposed changes to the Master Plan

Dear Mr Rivers:

I am a lifelong resident of New Orleans and have lived in Bywater for 42 years. I would like to share my thoughts on some issues regarding the work that you and your staff are doing regarding the Master Plan.

Before anything is done about Councilperson Ramsey's "cultural services" they must be defined. I fear that this extremely vague term could lead to rampant misuse of property in Bywater and throughout the city. Her voting record supports my fears.

I support the amendments made by the Louisiana Landmarks Society.

Density limits should remain as they are currently.

Historic Core areas should be encouraged to maintain the *toute ensemble* for future development.

Thank you,

Anthony J. Eschmann  
822 Lesseps St.

**Garden District Association**  
Post Office Box 50836  
New Orleans, LA 70150-0836  
504-525-7608    gardendistrictno@bellsouth.net

January 9, 2017

Mr. Robert D. Rivers, *Executive Director*  
New Orleans City Planning Commission  
1300 Perdido Street, Suite 7W03  
New Orleans, LA 70112

RE:    Comments on the Proposed Master Plan Amendments

Dear Mr. Rivers:

On behalf of the Garden District Association (GDA) Board and members, we want to commend you and the City Planning Commission staff for the on-going effort performed during the Master Plan Amendment process. Please accept this letter as our input regarding the proposed amendments.

Of the 12 proposed Future Land Use Map (FLUM) amendments, the GDA is in support of nine of the amendments as proposed by Councilmember Cantrell, presented in Table 1, below. The amendments will make the specific properties consistent with the current zoning.

**Table 1. Proposed FLUM Amendments Supported by the GDA**

<b>Request No.</b>	<b>Address</b>	<b>Proposed FLUM</b>
PD-02-02	1101, 1105, 1109, & 1117 Philin Street	RLD-PRE
PD-02-03	1516 & 1528 Jackson Avenue	RMD-PRE
PD-02-04	1437 & 1441 8 <sup>th</sup> Street	RI D-PRF
PD-02-05	3116 Prvtania Street	RLD-PRE
PD-02-06	1442 Harmonv Street	RI D-PRF
PD-02-07	1124 Louisiana Avenue	RLD-PRE
PD-02-08	1120 Toledano Street	RLD-PRE
PD-02-09	1113 9 <sup>th</sup> Street	RI D-PRF
PD-02-10	1111 6 <sup>th</sup> Street	RLD-PRE

The GDA is opposed to the following three proposed FLUM amendments.

1. Request No. PD-02-14 (2200 St. Charles Avenue) from RMD-PRE (Residential Pre-War Medium Density) to MUM (Mixed-Use Medium Density). The property is currently zoned HU-RM1. The building is a Victorian style house built in 1850 and thus does not have attributes of the MUM land use category.
2. Request No. PD-02-23 (All lots designated NC located in Squares 216 and 197 bounded by St. Charles Avenue, Fourth Street, Coliseum Street and Washington Avenue) by the CPC from NC (Neighborhood Commercial) to MUL (Mixed-Use Low Density). The businesses located in this area include The Rink (retail, professional offices and coffee shop), a realtor office and Commander's Palace Restaurant as well as condominiums and a single-family home. The businesses are small scale, neighborhood-oriented commercial developments thus meeting the FLUM goals for NC as currently designated on the FLUM. The FLUM goal is to provide neighborhood convenience with commercial establishments along the edges of neighborhoods. This area of the Garden District neighborhood is the epicenter and not the edge of the neighborhood.

*PD 2-2 thru 2-10*

3. We are opposed to the amendment submitted by Councilmember Williams to change Magazine Street from MUL (Mixed-Use Low Density) to MUM (Mixed-Use Medium Density). Magazine Street's development pattern is primarily businesses in residential structures converted to commercial activity. Magazine Street is also a cross-town transit corridor. While the range of uses are similar in nature the intensity of uses that are consistent with the CZO are much greater under the MUM than the MUL. Magazine Street is a neighborhood and visitor destination. To allow increased intensity in development would harm the character of Magazine Street and negatively impact the residential neighborhoods abutting and surrounding it.

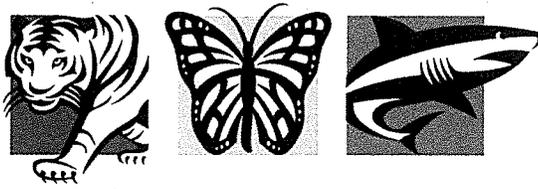
Regarding specific text amendments to Chapter 14, the Land Use Plan, we offer the following:

1. Request No. 14-22 Section A. The Land Use Plan and the "Force of Law": We are opposed to the CPC proposed amendment in which the Executive Director or his designee shall have authority to make final decisions on minor map amendments and final decisions on interpretations of the FLUM. This would violate the City Charter, Section 5-404.4, which specifies the mandatory review process and schedule as well as public input process in amending the Master Plan. Further, the limitations on amendments to the Master Plan are a safeguard to protect its integrity.
2. Request No. 14-17, Section C. Future Land Use Categories: We are opposed to removing the density limitations for all residential land use categories. The density limitations provide an overall goal for the development character of neighborhoods and thus should remain in the Master Plan. Removal of the density limitations would violate the City Charter. Section 5-402.1 of the City Charter, states *"The Land Use element shall consist of text setting forth land use issues and policies, and a Future Land Use Map setting forth categories of allowable uses and density, for the City."*
3. Request No. 14-15 and 14-16, Section C. Future Land Use Categories, Residential Pre-War Low Density (RLD-PRE): The proposed amendment to allow small multi-family residential is overly broad and conflicts with the existing goal of RLD-PRE to "Discourage the development of additional multi-family housing that is out of scale with existing character. We are opposed to the amendment.
4. Request No. 14-17, Section C. Future Land Use Categories, MUL (Mixed-Use Low Density) and MUM (Mixed-Use Medium Density): We are opposed to merging these two land use categories. The intensity of uses in the MUM categories is far greater than the intensity of uses in the MUL, in accordance with the proposed table showing the relationship between the land use categories and zoning classifications. The goal of the MUL category is to increase walkability within and along edges of neighborhoods while the goal of the MUM category is to serve as focal points within neighborhoods.

We look forward to the CPC staff review and recommendations to the Master Plan amendment process and the opportunity to provide further input on staff recommendations. Again, thank you and the CPC staff for your hard work on the Master Plan.

Sincerely,

André Gaudin  
President



Audubon Nature Institute  
*Celebrating the Wonders of Nature*

6500 Magazine Street • New Orleans, LA 70118  
AudubonInstitute.org

November 7, 2016

Robert Rivers  
Executive Director  
New Orleans Planning Commission  
7<sup>th</sup> Floor City Hall  
1300 Perdido Street  
New Orleans, LA 70130

Re: Responses to proposed amendments to City Master Plan—Green Infrastructure: Parks, Open Space and Recreation

Dear Mr. Rivers:

We are writing on behalf of the Audubon Commission, which is the public entity in the public/private partnership charged with administering, operating and maintaining New Orleans' unique family of museums and parks dedicated to nature. **Audubon Commission**, created by State Act 191 of 1914 and recognized by a 1996 amendment to the City Charter, is entrusted with management and control of the ten Audubon facilities. The Commission holds a management contract with **Audubon Nature Institute**, a 501 (c) 3 that is responsible for daily operations of all facilities.

This partnership manages a total of 630 acres of publicly accessible Parks and Open Space in four planning districts: Uptown, Downtown, New Orleans East, and Lower Coast Algiers. Over 91% of its annual operating budget is funded by self-generated revenue.

We fully support those amendments proposed by the Mayor and the City Planning Commission related to parks, open space and recreation. **In particular, we applaud the Mayor's recommended action for Goal 5: More public access to waterfronts, which calls for *Enhancing the existing public edge along the Mississippi River*.** We look forward to collaborating with the parties who will ensure that the opportunities presented by revitalization at the foot of Canal Street are fully realized.

**We also appreciate the City Planning Commission's proposed Future Land Use Map text change to Parkland and Open Space Range of uses: *In large parks, a variety of passive and active recreation facilities, cultural facilities and supportive commercial uses may be allowed.*** Including this language clarifies the necessity of balancing a variety of uses and potential revenue sources to best meet community expectations—a balance that has been widely debated since Audubon Park was first developed in the late 1800's, continued through the transformation of Audubon Zoo and development

---

*Celebrating the Wonders of Nature*

of Audubon Aquarium of the Americas, and will always be a part of public discourse when changing needs meet emerging opportunities.

**Amendments regarding restoration of the city's tree canopy, storm water management and resiliency are all in line with our mission tenet of preserving native Louisiana habitats.** These activities help provide homes for wildlife and protect our region's ecosystems and are incorporated into our landscaping projects. Since Hurricane Katrina, we have conducted a GIS-based tree inventory in Audubon Park, planted over 600 live oaks and 500 additional trees in Audubon Park and Audubon Zoo, and are restoring the forest of Audubon Louisiana Nature Center, located in Joe W. Brown Park in New Orleans East. Storm water management and tree planting will be prominently featured in the new Audubon Park master plan, which will start in 2017.

We feel strongly that master plans represent a best practice for large parks, and we are currently developing a scope of work for Audubon Park's next master plan that will extend to 2030. The planning process will include a thorough survey of park users and non-users as well as ample opportunity for public review of and input on the plans. We anticipate that the plan will officially launch in spring 2017 and will be completed by 2019. The resulting plan will include a process for public review of significant changes to the master plan. We further recommend that master plan requirements be left to the discretion of agencies that operated parks as opposed to being mandated within the City's Master Plan and CZO.

Establishing an inter-agency parks and recreation coordinating group would improve collaboration and planning among various park agencies. A group that met regularly could share information and stay on top of recreational trends, helping identify the optimal locations for park and recreational assets. **We support proposed amendments calling for and clarifying the role of an inter-agency parks and recreation coordinating group with voluntary participation by independent agencies.**

Several proposed amendments appear to undermine the authority granted to the agencies that manage park space.

- **We are opposed to the proposal to create new land use categories (Natural Areas, Open Space and Recreational Areas) and apply these categories in the Master Plan and the Comprehensive Zoning Ordinance.** This proposal would greatly limit an agency's ability to respond quickly to community needs as preferences for recreational and leisure activities change. A regional park's Master Plan already outlines how land will be used within park boundaries, offering a variety of experiences to serve as many park users as possible. This proposal is redundant and overly proscriptive.
- **We are not in favor of specifying a "blanket" threshold for triggering a public review process.** A 10,000 square foot project in a neighborhood park has a greater impact than a 10,000 square foot project in a regional park; a \$100,000 project could be very small or very large depending on its purpose. Thresholds for public review should be left to the discretion of the operating agency that hears arguments for and against land uses on a daily basis. This understanding of the diversity of opinion on community needs uniquely positions operating entities to make decisions that best serve the majority of park users.

We appreciate the work you and the City Planning Commission are doing to update the City's Master Plan, and we are grateful for the opportunity to respond to proposed amendments. We look forward to

working with your team and our colleagues to provide outstanding parks and recreational venues for our community and visitors.

Sincerely,

A handwritten signature in black ink, appearing to read "Ron". The letters are fluid and connected, with a large initial "R" and a smaller "on" following.

L. Ronald Forman



November 4, 2016

1 Palm Drive  
New Orleans, LA  
70124-4608

504.482.4888  
FAX 504.483.9412

Catering/Sales  
504.488.2896  
Fax 504.483.9379

[www.neworleanscitypark.com](http://www.neworleanscitypark.com)

Robert Rivers  
Executive Director  
New Orleans Planning Commission  
7<sup>th</sup> Floor City Hall  
1300 Perdido Street  
New Orleans, Louisiana 70130

Re: Responses to proposed amendments to City Master Plan concerning Parks and Recreation

Dear Mr. Rivers:

On behalf of the City Park Improvement Association, a State Agency, charged with the responsibility of managing New Orleans City Park, we would like to offer comments on proposed amendments to the City's Master Plan which concern Parks and Recreation. We support the submittals dealing with the Master Plan amendment that have been proposed by the Mayor's Office and City Planning Commission and offer the following comments on other proposals.

- 1. Two proposed amendments to the Master Plan seem to focus on having a Master Plan for Parks and an updated Parks and Recreation element of the overall Master Plan.**

*For your information, City Park has long had a State requirement for a Master Plan and State legislation lays out the procedures for the adoption of the plan which requires public input at a formal public hearing. Since the adoption of our plan in 2005, the plan has been amended four times with the required public input. The Park is currently conducting a planning exercise for a 200 acre portion of the Park and is holding public workshops and web site surveying to gain insight into the different uses this area of the Park could hold. Before the Master Plan is amended we will hold a formal public hearing to further receive input. Our planning process has proved effective in keeping the plan up to date and responsive to changing public interests and independent surveying shows that over 90% of the public agrees with the direction laid out in the plan.*

City Park receives minimal public operating support and is required to raise nearly 90% of its operating revenue through activities in the Park. This places a priority on good planning and being a responsible financial steward of the Park.

City Park fully participated in the last update to the Recreation element of the City Master Plan and we look forward to participating again, whenever that process gets underway.

Other comments favor conducting a systematic assessment of park users (and we would add assessing the needs and desires of those who currently are not active park users)

including on-site observations. City Park has conducted a yearly assessment of people who tell us they use the Park, for more than a decade. We obviously support this recommendation.

*We fully support requiring regional parks to have a Master Plan and applaud the goal to frequently update the parks and recreation portion of the Master Plan.*

- 2. Several comments also advocate for a coordinating body among park and recreation providers to be certain there is no overlap in the provision of facilities and services.**

*We agree and have long supported the creation of a coordinating body among the disparate recreation providers to better coordinate the provision of recreation facilities and programs and reduce the possibility of duplication of effort.*

- 3. One proposal suggested the creation of new land use categories (Natural Areas, Open Space, and Recreational Areas) and the application of these categories in the Master Plan and the Comprehensive Zoning ordinance.**

We believe this proposal is unnecessary, counterproductive and undermines the responsibility and authority of Park managers. It should be the park's Master Plan which dictates land uses, so to imbed these categories in the City's Master Plan let alone the zoning ordinance is a mistake. This proposal seeks to put a strait jacket around parks and prevent their ability to change and to adapt to the public's evolving desires for public park land. Almost all parks change over the years as they respond to changing recreation, leisure and educational forces. The City has long defined the role of regional parks as being one of providing a wide variety of uses to address the needs of citizens. It is the role of the plan to implement that mission. Attempts to micromanage uses outside of the parks plan is wrong.

*We disagree with the proposal to create new land use categories.*

- 4. Two of the proposed amendments seem to suggest that tighter scrutiny is needed over the way land use decisions in Parks are made and that "conversion of green space to specialized uses or to intensive and commercial uses" must be prohibited.**

Land use in larger urban parks is about balancing the wishes and desires of large cross sections of citizens who wish to utilize parks in many different ways. It is also about balancing the desires of different members of the public with other public goals such as resilience requirements, storm water management, fiscal stewardship and the changing demographic of the public. Attempting to over regulate through the use of expanded land use categories and the insertion of these categories into the zoning ordinance is an attempt to restrict, for the benefit of particular users, the ability of park agencies to balance competing demands.

We believe that the entity best equipped to balance these sometimes competing desires is the entity closest to those desires, who hear from the different constituent groups

daily and who know the park intimately because they have been given the authority and responsibility to manage the asset. At City Park, we are in constant contact with people who currently use the park and those who wish to use the park. We hear, on almost a daily basis, from sports participants, passive park advocates, those who propose cultural and other special events, walkers, joggers, bikers, garden enthusiasts, and many other groups. That is why attempting to over regulate through the use of expanded land use categories and the insertion of these categories into the zoning ordinance is such a bad idea. It is attempting to restrict, for the benefit of particular users, the ability of park agencies to balance competing demands.

All uses in parks are specialized. Open space limits the ability to play tennis or rugby or many field sports. Likewise field sports limits the ability to have open space. The fact that there are different uses in parks and some uses require a fee or other special condition does not make them inappropriate park uses. It is simply a reflection of a balance between active and passive use.

Change is inevitable and has been an integral part of City Park since its inception. That change is and should be managed by the park's plan.

*City Park is the largest regional park in the metropolitan area and has had a Master Plan for many years. That is the vehicle to structure land use decisions in a regional park not regulations favoring blanket prohibitions.*

#### **5. Creation of thresholds**

One proposal suggested the establishment of thresholds which would trigger a public review process for individual projects proposed under the city's CIP. The recommendation suggest this process for "major investments". The thresholds suggested in the proposal are arbitrary and lack a sense of scale for activities in neighborhood playgrounds versus large regional parks. If the City believes thresholds should be established it should be done through the update to the Parks and Recreation Master Plan where sufficient time and effort can be applied so realistic thresholds scaled to different sized parks can be developed.

*We disagree with the thresholds suggested.*

In summary, we agree with several of the proposals which have been suggested including the requirement for park master plans, updating the recreation element of the city plan and the establishing of a coordinating body for park and recreation services.

We believe that the other suggested amendments are counterproductive and attempt to inappropriately restrict the ability of parks to address changing public recreation demands.

Thank you for giving us the opportunity to comment on these proposed amendments to the City's Master Plan. We look forward to participating in updating the Recreation

element of the Master Plan and working with our regional park partners in providing the best in facilities programs and services to the region's visitors and guests.

Sincerely,

A handwritten signature in black ink that reads "Robert W. Becker". The signature is written in a cursive style with a long, sweeping tail on the letter "k".

Robert W. Becker Ph.D. FAICP  
Chief Executive Officer